

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

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CAROLYN MCGOWAN CLERK
MIDDLE DISTRICT COURT
MONTGOMERY, ALARoger Charles Lanier 220979Full name and prison number
of plaintiff(s)

v.

Governor Bob Riley; CommissionerRichard F. Allen; Warden T. Wise;
Warden Mitchem; Warden
Levan Thomas; Wardens ^{and} [redacted]Captains John Does and etc. ALName of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)CIVIL ACTION NO. 2:06-cv-353-WHA
(To be supplied by Clerk of
U.S. District Court)

Jury Trial requested

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court
dealing with the same or similar facts involved in this
action? YES () NO (✓)B. Have you begun other lawsuits in state or federal court
relating to your imprisonment? YES () NO (✓)C. If your answer to A or B is yes, describe each lawsuit
in the space below. (If there is more than one lawsuit,
describe the additional lawsuits on another piece of
paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) N/ADefendant(s) N/A2. Court (if federal court, name the district; if
state court, name the county) N/A

3. Docket number N/A

4. Name of judge to whom case was assigned N/A

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit N/A

7. Approximate date of disposition N/A

II. PLACE OF PRESENT CONFINEMENT Kilby Correctional Facility, P.O. Box 150, MT. Meigs, AL 36075

PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Limestone Corr. Facility; Elmore Correctional Center; Kilby Correctional Facility

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME	ADDRESS
1. Governor Bob Riley	300 Dexter Ave., Mont. AL 36104
2. Commissioner Richard F. Allen	300 Dexter Ave., Mont. AL 36104
3. Warden Mitchem	28779 Nick Davis Rd., Harvest, AL 35749
4. Warden Wise	28779 Nick Davis Rd., Harvest, AL 35749
5. Warden Thomas	P.O. Box 8, Elmore, AL 36025
6. Warden of Kilby	P.O. Box 150, MT. Meigs, AL 36075

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED [REDACTED]

[REDACTED]

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Cruel and unusual punishment 8th Amendment

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

Plaintiff has been denied reasonable safety, medical care, food and shelter and crowding and degrading and abusive conditions. This has taken place within the ADoc. from 2002 up until the present time.

To included officers & inmates throughout the ADOC who denied plaintiff reasonable safety by attempting to murder plaintiff by a pay off.

GROUND TWO: Delayed and denied medical care. and adequate medical care; forced meds by Mental Health Staff.

SUPPORTING FACTS: I was placed in Seg and refused phone calls and mail intercepted, psychotropic meds were put in my food causing all kinds of physical pains and always was refused medical physical treatment, I was always referred to Mental Health when the problem was a security matter. where my rights under due process and informed consent were ignored by Mental Health Staff.

GROUND THREE: ~~14th Amendment & 8th Amendment~~, unconstitutional liberty interests, Civil Liberties, denied access to meaningful, effective, ^{adequate} access to court

SUPPORTING FACTS: Right to refuse medical treatment abridged by Mental Health Staff at Limestone, Elmore and Kilby Corr Facility. Have been assaulted repeatedly by officers at several facilities to include inmates. Classification releasing Classification matters to inmates and others, Holding Legal Mail, reading privileged mail and drugging me to copy my legal notes. Cell searches - retaliation, Correspondence opened copied and delayed phone calls recorded, Bugged on my person and viewed with camera while in cell performing bodily functions & while I file legal work. Retaliation

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Issue an injunction ordering plaintiff's to turn custody of plaintiff over to the Federal
gov/prison. Award Compensatory damages of 100,000.00
that in punitive damages as the Court sees fit and a declaratory judgement on each defendant

Roger C. Lanier / 220979
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true
and correct.

EXECUTED on 4-18-06
(Date)

Roger C. Lanier / 220979
Signature of plaintiff(s)